
Alaska Telephone Association

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Christine O'Connor
Executive Director

October 4, 2017

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

RE: Ex parte filing in WC Docket Nos. 16-271, 10-90 and 11-42

Dear Ms. Dortch:

On September 29th the undersigned met with Janet Sievert and Sayuri Rajapakse, with the Office of Native Affairs and Policy, to discuss reporting requirements related to the Alaska Plan, projects underway by companies participating in the Plan, minimum standards for Lifeline service in remote Alaska and ongoing tribal engagement activities in Alaska.

The Alaska Plan Order requires companies participating in the Alaska Plan to provide maps of fiber and microwave middle mile facilities existing today and deployed during the term of the Plan.¹ The instructions for reporting these middle mile facilities were provided in a Public Notice released September 8, 2017. However, the instructions, as released, require extensive reporting on last mile facilities and will be extremely time-consuming and expensive to implement. Ms. O'Connor expressed concern that without modification, the additional reporting beyond middle mile facilities will divert significant resources from broadband service and deployment and is beyond the scope of the Alaska Plan Order.

Ms. O'Connor provided a list of some of the projects underway by companies participating in the Alaska Plan (attached). She requested that companies participating in the Alaska Plan be granted access to the High Cost Universal Broadband (HUBB) portal as quickly as possible so they can upload geocoded locations of broadband service where it has already been provided under the Alaska Plan.

Ms. O'Connor also discussed the need for Lifeline service in Alaska's most remote areas and the barriers created by the minimum standards of the program. She suggested that clarification and waiver of certain standards in limited areas will be necessary to allow qualifying subscribers in remote Alaska to participate in Lifeline.

Ms. O'Connor reviewed the positive tribal engagement activities happening in Alaska, particularly during the upcoming Alaska Federation of Natives Convention in Anchorage, October 19-21.

¹ See Alaska Plan Order, released August 31, 2016 at paragraph 102.

Respectfully submitted,

Via ECFS 10/4/2017

Christine O'Connor
Executive Director

cc: Janet Sievert
Sayuri Rajapakse